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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

April 18, 2013

Mr. David A. Noble
City Engineer/Director of Community Development
City of Ottawa
301 W. Madison Street
Ottawa, Illinois 61350

RE: City of Ottawa – Brownfield Assessment
Cooperative Agreement # BF00E01087-0
Sampling Plan Approval – Former Central School Properties

Dear Mr. Noble:

I have reviewed both your site specific Sampling Plan [Revised April 17, 2013] and Health and Safety Plan for the Former Central School Properties located at 400 Clinton Street, Ottawa, Illinois. Based on the approved QAPP prepared by Fehr-Graham & Associates, LLC ; and the February 26, 2013, acceptance of your determination of eligibility for brownfields funds, it appears you are ready to start sampling this Thursday [May 28, 2009], as planned.

Please contact me if anything changes or if you have any questions. Don't forget to send me copy of the reports and update the ACRES database with the property profile form for this site.

Thanks.

Romona R. Smith

Romona R. Smith
Brownfields Project Manager/Officer

cc: Rob Wilhelmi, Project Manager, Fehr Graham

PHASE I ENVIRONMENTAL SITE ASSESSMENT

Former Central Elementary School Property
400 Clinton Street
Ottawa, Illinois 61350

Project No.: 48569P – A02E

December 6, 2012

FEHR GRAHAM
ENGINEERING & ENVIRONMENTAL

1920 Daimler Road

Rockford, Illinois 61112

Prepared for:

City of Ottawa

301 West Madison Street

Ottawa, Illinois 61350

CA#

BE06E 01087-0

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1.0 SUMMARY

At the request and authorization of the City of Ottawa; Fehr-Graham & Associates, LLC (Fehr Graham) has completed a Phase I Environmental Site Assessment (ESA) on the former Central Elementary School *property* located at 400 Clinton Street in Ottawa, Illinois.

Based upon the information provided from results of record searches, site investigation, environmental database search, survey of physical features, historical data, and interviews; this assessment has revealed no evidence of Recognized Environmental Conditions (RECs) in connection with the *property* except for the following:

- Historical groundwater contamination of the shallow and deep groundwater bearing units on Parcel A of the *property* that is not covered under the existing NFR Letter for the former Municipal Gas Plant Remediation Site.
- Detected soil contamination on Parcel A and the northern and eastern areas of Parcel B that exceeds TACO Tier 1 Soil Remediation Objectives and established area background concentrations. Detected contaminants include benzene, arsenic, and several polynuclear aromatic hydrocarbons.
- A former “chemical house” associated with the Illinois Starch Company’s factory that was identified as operating at the north-central region of the *property* in the middle 1870s.
- A historical gasoline tank is depicted at the north-central region of the *property* in a Sanborn map dated 1925.
- The likely use of rodenticides at the former Norris Grain Elevator that is depicted as operating at the southeast corner of the *property* on a 1947 Sanborn map.
- An out-of-service heating oil underground storage tank system currently located at the northeast corner of the vacant school building.

In addition to these RECs, the potential need for a vapor intrusion assessment to be completed on the *property* represents a Business Environmental Risk (BER). A BER is a risk that can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel or commercial real estate, which is not necessarily limited to those environmental issues required to be investigated as part of this Phase I ESA.

2.0 INTRODUCTION

2.1 Purpose

Fehr Graham has completed a Phase I Environmental Site Assessment (ESA) on the former Central Elementary School *property* located at 400 Clinton Street in Ottawa, Illinois. This assessment was performed at the request and authorization of the City of Ottawa. The purpose of this Phase I ESA is to identify, to the extent feasible, Recognized Environmental Conditions (RECs) in connection with the *property* or surrounding properties that may be potential sources of environmental risk or liability. The ASTM E 1527-05 Standard defines a REC as: "The presence or likely presence of any *hazardous substances or petroleum products* on a *property* under conditions that indicate an existing release, a past release, or a *material threat* of a release of any *hazardous substances or petroleum products* into structures on the *property* or into the ground, groundwater, or surface water of the *property*. The term includes *hazardous substances or petroleum products* even under conditions in compliance with laws. The term is not intended to include *de minimis* conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be *de minimis* are not *recognized environmental conditions*."

The assessment is also intended to satisfy the All Appropriate Inquiry (AAI) requirements of the Small Business Liability Relief and Brownfields Revitalization Act of 2002 [42 USC 103 I 9601] and 40 CFR Part 312, Innocent Landowners, Standards for Conducting All Appropriate Inquiries. Furthermore, the Environmental Protection Agency has determined within Volume 70, No. 210, Page 66081 of the Federal Register dated November 1, 2005; that the ASTM E 1527-05 Standard, entitled "Standard Practices for Environmental Site Assessments: Phase I Environmental Site Assessment Process" is recognized as being consistent with the statutory criteria for conducting All Appropriate Inquiries and is compliant to the final rule. This assessment has been performed in general accordance with ASTM E 1527-05 and applicable portions of the Illinois Environmental Protection Act, Section 22.2 [415 ILCS 5/22].

2.2 Detailed Scope of Services

The scope of services for the preparation of this Phase I Environmental Site Assessment included the collection and evaluation of reasonably available information by:

- 1) Conducting site reconnaissance to obtain information indicating the likelihood of Recognized Environmental Conditions in connection with the *property*.
- 2) Conducting an evaluation of properties in the vicinity of the *property* to identify the likelihood of Recognized Environmental Conditions in connection with the adjacent properties that could be considered a REC to the *property*.
- 3) Reviewing *Government Records* available through database record searches to identify Recognized Environmental Conditions in connection with the *property* and general vicinity.
- 4) Requesting any permits, enforcement documents, or other items contained within regulatory agency files, which pertain to the *property*.
- 5) Reviewing available and reasonably ascertainable historical use sources to develop a history of the previous uses of the *property* in order to identify the likelihood of past uses having led to Recognized Environmental Conditions in connection with the *property*.
- 6) Conducting a survey of physical setting sources to assess the impact of potential migration (site geology and hydrology) as related to Recognized Environmental Conditions at the *property*.
- 7) Conducting interviews with reasonably ascertainable current/past owners, site managers, and occupants along with individuals associated with surrounding properties to obtain information pertaining to Recognized Environmental Conditions in connection with the *property*.

Additional contractual conditions outside the standard scope of services required by the Environmental Professional and agreed upon by the User of this Phase I ESA includes Fehr Graham contracting a title company to undertake a review of reasonably ascertainable recorded land title records and lien records for environmental liens or activity and use limitations currently recorded against or relating to the *property*.

In accordance with the ASTM guidelines for Phase I Environmental Site Assessments, analytical sampling of air, soils and groundwater was not conducted. In addition, the following issues were specifically not addressed during the site investigation, nor included within this assessment: asbestos containing materials (ACM); other building materials; mold; biological agents; radon gas; lead-based paints; radioactivity; lead in drinking water; electromagnetic fields; regulatory compliance; cultural and historical resources;

industrial hygiene, indoor air quality; vapor intrusion; health and safety; ecological resources; endangered species; and wetlands.

2.3 Significant Assumptions

This assessment is intended to reduce, but not eliminate, uncertainty regarding the potential for Recognized Environmental Conditions (REC) in connection with the *property*, within reasonable limits of time and cost. In some instances, it is necessary to make certain assumptions in regards to a piece of *property* in order to draw conclusions about conditions found on the *property*. It is important to be aware of any significant assumptions made in relation to the *property* when reviewing the Environmental Professional's assessment of the *property*. All significant assumptions made during the completion of this Phase I ESA are identified below.

In general, groundwater flow direction has been determined based on topography in the vicinity of the *property*; i.e., the assumption that shallow groundwater flow will follow surface topography, or on other available resources. No site-specific field measurements of groundwater flow direction (e.g., installation of groundwater monitoring wells) have been performed. As a result, Fehr Graham has obtained and reviewed site information for sites located in a presumed up-gradient direction of groundwater flow that, further based on proximity and knowledge of potential contaminant fate and transport, may present a potential to impact the *property*.

2.4 Limitations, Exceptions, and Deviations

Inevitably, there are cases where a *property* possesses limitations, exceptions, and deviations that do not allow the Environmental Professional to accurately or confidently assess past or present environmental impacts to the site. In addition, there are times when certain exceptions must be made in order to continue with the assessment process. Deviations may result from User-imposed constraints or physical limitations. These limitations, exceptions, and deviations can directly affect a site assessment. The following limitations, exceptions, and deviations were encountered during site reconnaissance activities and the preparation of this Phase I ESA:

- The school auditorium and crawl space that spans beneath a majority of the building were sealed off and not accessible as a result of potential asbestos contamination that resulted from the 2008 flooding.
- A key was unable to be located that could provide access to the interior of a storage shed located at the northwestern region of the *property*.
- Interior access to the Ottawa River Rescue Building was unavailable at the time of the site reconnaissance.

2.5 Special Terms and Conditions

Consideration must be given to any special terms and conditions unique to a particular Phase I ESA. Freedom of Information Act (FOIA) requests have been submitted to government entities requesting documentation relating to the environmental history of the *property* and surrounding properties. Responses to such requests are often backlogged; therefore, any pertinent information that becomes available upon completion of this report will be forwarded as an amendment to this document. Any Data Gaps generated as a result of the deficiencies are listed and explained in Sections 8.1.4 (Findings) and 9.0 (Opinions), respectively. Additionally, the findings of this report are based upon record and document reviews, site observations, interviews, and other sources of information presented in this report. No collection of samples, testing or intrusive investigation was conducted.

2.6 User Reliance and Obligations

Fehr Graham does not warrant or guarantee the environmental conditions of the site or warrant the User's ability to assert any of the defenses under the Small Business Liability Relief and Brownfields Revitalization Act or any comparable state and/or local laws.

Documents and data provided by the User, designated representatives of the User, or other interested parties, and consulted in the preparation of this assessment, have been reviewed and may be referenced herein, with the understanding that Fehr Graham assumes no responsibility or liability for their accuracy.

As presented within ASTM E 1527-05 Standard (Section 6.0, User's Responsibility), certain tasks are required to be performed by the User of the Phase I ESA to help identify possible RECs in connection with a *property*, unless otherwise included as an additional scope of work agreed upon by the User within the signed Order for Professional Engineering Services. A description of the User required tasks are presented within Section 4.0 of this Phase I ESA. In addition, Section 4.0 of this report presents any information provided by the User. Any insufficiencies related to the User required tasks are presented in Section 2.4, Limitations, Exceptions, and Deviations of this Phase I ESA.

This assessment has been prepared for the exclusive use of the City of Ottawa, Illinois, the Ottawa Port District, and any authorized representatives. No other party shall have any right to rely on any service provided by Fehr Graham without prior written consent. Additionally, there are time limitations to this report that affect the User's reliance. As found within 40 CFR 312.20, "All appropriate inquiries pursuant to CERCLA section 101(35)(B) must be conducted within one year prior to the date of acquisition of the subject property". Furthermore, the following components of the All Appropriate Inquiries must be conducted or updated within 180 days of and prior to the date of acquisition of the *property*:

- 1) Interviews with past and present owners, operators, occupants.
- 2) Searches for recorded environmental cleanup liens.
- 3) Reviews of federal, tribal, state, and local government records.
- 4) Visual inspections of the facility and of adjoining properties.
- 5) The declaration by the Environmental Professional.

Table 1 presents the dates of completion of the above specified components for this assessment. Should the date of the *property* acquisition be beyond the above specified time periods, the Phase I ESA and/or the required components would require an update in order to rely on this assessment.

Table 1 – Component Completion Dates

Component	Date(s) Completed	Validity
Completion Date of Phase I ESA	December 6, 2012	1 Year
Interviews with past and present owners, operators, occupants	October 29, 2012	180 Days
Searches for recorded environmental cleanup liens	November 1, 2012	180 Days
Reviews of federal, tribal, state, and local government records	September 28, 2012	180 Days
Visual inspections of the <i>property</i> and of adjoining properties	September 14, 2012	180 Days
The declaration by the Environmental Professional	December 6, 2012	180 Days

3.0 SITE DESCRIPTION

3.1 Location and Legal Description

The *property* is located at 400 Clinton Street in Ottawa, Illinois. A Site Vicinity Map and Site Plan are presented in Appendix 1. The *property* consists of two (2) land parcels that are referred to as Parcels A and B. Legal Descriptions for Parcels A and B are as follows:

PARCEL A – THAT PART OF THE ILLINOIS AND MICHIGAN CANAL LAND SOUTH OF THE HYDRAULIC BASIN AT OTTAWA, LOCATED IN THE SOUTHEAST FRACTIONAL QUARTER OF SECTION 11, TOWNSHIP 33 NORTH, RANGE 3 EAST OF THE 3RD PRINCIPAL MERIDIAN DESCRIBED AS FOLLOWS: COMMENCING AT THE CENTER OF SECTION 11, TOWNSHIP 33 NORTH, RANGE 3 EAST OF THE 3RD PRINCIPAL MERIDIAN AND RUNNING SOUTHERLY ALONG THE WEST LINE OF THE SOUTHEAST FRACTIONAL QUARTER OF SAID SECTION AND ALONG THE WEST SIDE OF THE LATERAL CANAL, 686.86 FEET TO A POINT ON THE SOUTH LINE OF THE HYDRAULIC BASIN; THENCE CONTINUING ALONG SAID WEST LINE, 143.16 FEET TO THE POINT OF BEGINNING; THENCE EASTERLY ALONG A LINE PARALLEL WITH THE SOUTH LINE OF THE HYDRAULIC BASIN, 383.18 FEET TO A POINT; THENCE SOUTHERLY ALONG A LINE PARALLEL WITH THE WEST LINE OF THE SOUTHEAST FRACTIONAL QUARTER, ± 514 FEET TO A POINT ON THE NORTH SHORE LINE OF THE ILLINOIS RIVER, THENCE WESTERLY ALONG THE SAID SHORELINE TO THE WEST LINE OF THE SOUTHEAST FRACTIONAL QUARTER OF SAID SECTION; THENCE NORTHERLY ALONG SAID WEST LINE, ± 515 FEET TO THE POINT OF BEGINNING, CONTAINING 4.5 ACRES MORE OR LESS, ALL IN LASALLE COUNTY, ILLINOIS.

PARCEL B – THAT ALL OF OUTLOTS 63 THRU 71, AND THAT PART OF OUT LOT 62 LYING EAST OF A LINE 263.5 FEET EAST OF THE WEST LINE OF SAID OUTLOT 62 AND SOUTHERLY OF THE SWITCH TRACK OF THE CHICAGO, BURLINGTON & QUINCY RAILROAD COMPANY, ALL IN THE SUBDIVISION OF THE SOUTHWEST FRACTIONAL QUARTER OF SECTION 11, TOWNSHIP 33 NORTH, RANGE 3 EAST OF THE THIRD PRINCIPAL MERIDIAN; AND ALSO THAT PART OF THE SOUTHWEST FRACTIONAL QUARTER OF SAID SECTION LYING SOUTH OF THE SOUTH LINE OF OUTLOT 71 AND NORTH OF THE NORTH SHORE OF THE ILLINOIS RIVER; AND ALSO THAT PART OF THE ILLINOIS AND MICHIGAN CANAL LAND SOUTH OF THE HYDRAULIC BASIN AT OTTAWA, LOCATED IN THE SOUTHEAST FRACTIONAL QUARTER OF SECTION 11, TOWNSHIP 33 NORTH, RANGE 3 EAST OF THE 3RD PRINCIPAL MERIDIAN DESCRIBED AS FOLLOWS: COMMENCING AT THE CENTER OF SECTION 11, TOWNSHIP 33 NORTH, RANGE 3 EAST OF THE 3RD PRINCIPAL MERIDIAN AND RUNNING SOUTHERLY ALONG THE WEST LINE OF THE SOUTHEAST FRACTIONAL QUARTER OF SAID SECTION AND ALONG THE WEST SIDE OF THE LATERAL CANAL, 686.86 FEET TO A POINT ON THE SOUTH LINE OF THE HYDRAULIC BASIN, SAID POINT ALSO BEING THE POINT OF BEGINNING; THENCE EASTERLY ALONG THE SOUTH LINE OF THE HYDRAULIC BASIN, 810 FEET TO THE WEST LINE OF LASALLE STREET; THENCE SOUTHERLY ALONG THE WEST LINE OF LASALLE STREET, ± 602 FEET TO THE NORTH SHORE OF THE ILLINOIS RIVER; THENCE WESTERLY ALONG THE SAID NORTH SHORE LINE TO A POINT ON A LINE THAT IS 383.18' EAST OF AND PARALLEL TO THE WEST LINE OF THE SOUTHEAST FRACTIONAL QUARTER SECTION; THENCE NORTHERLY ALONG SAID PARALLEL LINE ± 514 FEET TO A POINT ON A LINE THAT IS 143.16 FEET SOUTH OF AND PARALLEL TO THE SOUTH LINE OF THE HYDRAULIC BASIN; THENCE WESTERLY ALONG SAID PARALLEL LINE 383.18 FEET TO A POINT ON THE WEST LINE OF THE SOUTHEAST FRACTIONAL QUARTER SECTION; THENCE NORTHERLY ALONG SAID WEST LINE, 143.16 FEET TO THE POINT OF BEGINNING, CONTAINING 12.2 ACRES MORE OR LESS, ALL IN LASALLE COUNTY ILLINOIS.

3.2 Site and Vicinity General Characteristics

The *property* is located at the southern region of Ottawa's downtown district and is immediately north of the Illinois River. The *property* consists of two (2) land parcels, Parcel A and B. Parcel A is approximately 4.5 acres and Parcel B is approximately 12.2 acres.

3.3 Current Use of the Property

The *property* contains a vacant building that formerly operated as a public elementary school for Ottawa Elementary District 141. The building was condemned as a result of significant damage caused by severe flooding that occurred on the Illinois and Fox Rivers in 2008. The far eastern portion of the *property* contains a public parking lot and a small building that houses the Ottawa River Rescue Squad.

3.4 Description of Site Structures, Roads, and Improvements

Parcel A contains an approximately 70,000 square foot vacant former elementary school. Parcel B contains outdoor basketball courts, a softball field, a rubberized all-weather athletic track, playground areas, and an asphalt-paved parking lot that are no longer utilized. A storage shed of approximately 720 square feet in size is present near the northwest region of Parcel B. A portion of an asphalt-paved public parking lot and an approximately 2,630 square foot structure housing the Ottawa River Rescue Squad are present at the eastern limits of Parcel B. A portion of Albin Stevens Drive, an asphalt-paved roadway, is also present near the eastern limits. A paved boat dock provides direct access to the Illinois River at the southeastern *property* limits. Both parcels are currently owned by the Ottawa Elementary School District 141.

The *property* is connected to all major public utilities. Public water, sanitary sewer, and natural gas utilities are provided through underground service mains. Public electrical services are provided overhead from adjacent utility poles.

3.5 Current Uses of Adjoining Properties

Table 2 identifies the location, owner/occupant(s), and apparent use(s) of adjacent properties.

Table 2 - Adjacent Property Summary

Direction	Owner/ Occupant	Address	Apparent Property Use
North/ East	City of Ottawa	Woodward Memorial Drive	Municipal Parking Lot
North/ Northwest	Unknown	401 – 433 West Main Street	Knights of Columbus (401), U.S. Post Office (405), Medi-Rx Pharmacy (411), First Federal Savings Bank (433)
East	Ottawa Elementary School District 141	N/A	Municipal Parking Lot and Right- of-Way Areas
West	CSX Railroad	N/A	Active Railroad Line
South	N/A	N/A	Illinois River

4.0 USER PROVIDED INFORMATION

A User Provided Information Sheet was provided to Mr. David Noble. Mr. Noble is the City Engineer for the City of Ottawa. As presented within ASTM E 1527-05 Standard (Section 6.0, User's Responsibility), certain tasks are required to be performed by the User of the Phase I ESA to assist the Environmental Professional (EP) in identifying potential RECs in connection with a *property*. A copy of the completed User Provided Information Sheet, as well as any additional information provided by the User, is included in Appendix 2.

4.1 Title Records

Reasonably ascertainable recorded land title records can be checked by the User to evidence records of fee ownership, leases, land contracts, easements, liens, and other encumbrances on the *property*. The User of this Phase I ESA has authorized Fehr Graham to contract a title company to undertake a review of reasonably ascertainable recorded land title records and lien records for environmental liens or activity and use limitations currently recorded against or relating to the *property*. The title records review was included as an additional scope of services to be completed by Fehr Graham. Information obtained from the title records review is included within Section 5.0, Records Review, of this Phase I ESA.

4.2 Environmental Liens or Activity and Use Limitations

An environmental lien is a charge, security, or encumbrance upon title to a *property* to secure the payment of a cost, damage, debt, obligation, or duty arising out of response actions, cleanup, or other remediation of hazardous substances or petroleum products upon a *property*. An activity and use limitation is a legal or physical restriction or limitation on the use of, or access to, a site or facility to either reduce or eliminate potential exposure to hazardous substances in the soil or ground water on the *property*, or to prevent activities that could interfere with the effectiveness of a response action, and to ensure maintenance of a condition of no significant risk to public health or the environment. Mr. Noble indicated in the User Provided Information Sheet that a coal gasification plant had historically existed in the vicinity of the current athletic track and that certain activity and land use limitations exists as a result, which include possible construction and potable groundwater well limitations.

4.3 Specialized Knowledge

In some cases, specialized knowledge of a site or experience with a particular operation may be material to identifying Recognized Environmental Conditions in connection with the *property* and/or adjacent properties. Mr. Noble indicated in the User Provided Information Sheet that he has no specialized knowledge pertaining to the *property*.

4.4 User Provided Commonly Known or Reasonably Ascertainable Information

Mr. Noble provided the following commonly known or reasonably ascertainable Information:

- Past uses of the *property* include a school, coal gasification plant, clay brick manufacturing, open space/recreational uses, and a river rescue facility.
- Specific chemicals currently present or once present include coal gasification chemicals below ground and at the ground surface.
- Release potential exists from a fuel oil Underground Storage Tank (UST) that is present adjacent to the school building.
- A three-foot thick cap was placed on the surface of the athletic track area

4.5 Valuation Reduction for Environmental Issues

If the purchase price of the *property* does not reasonably reflect the fair market value of the *property* or comparable properties, if not contaminated; it is the responsibility of the User of a Phase I ESA to identify an explanation for the lower price. It must also be considered whether the lower purchase price is because contamination is known or believed to be present at the *property*. Mr. Noble indicated in the User Provided Information Sheet that the purchase price reflects the fair market value of the *property*, which is a lower price because of known contamination issues.

4.6 Owner, Property Manager, and/or Occupant Information

Mr. Noble indicated that the Ottawa Elementary School District 141 is the current owner of the former school related land. Mr. Cleve Threadgill was identified as the current Superintendent and Mr. Marc Tabor was identified as the Ground Superintendent.

4.7 Reason for Performing Phase I ESA

Mr. Noble indicated that the Phase I is being completed to protect the City's liability, qualify the City to use Brownfields grant funds, and to identify the likelihood of insurmountable problems related to the *property*.

4.8 Degree of Obvious Indicators of Contamination

Mr. Noble stated that a vent and fill pipe for the UST system is visible near the front door of the former school building.

4.9 Additional User Provided Information

Mr. Noble indicated that the Ottawa Elementary School District is in possession of environmental related reports for the *property*. Although Mr. Noble was not in aware of the quantity and complexity of the reports, he was able to provide the following:

Phase II Environmental Site Assessment – November 2008

The report was prepared on behalf of the Ottawa School District by Aires Consulting Group. The investigation consisted of the collection of ten (10) soil samples (SB-1 – SB-10) from ten (10) soil borings advanced at exterior areas and in the crawlspace beneath the school structure. Two (2) surface soil samples (SSB-1 and SSB-3) were also collected. The soil samples were analyzed for Volatile Organic Compounds (VOCs); Semi-VOCs (SVOCs), which includes Polynuclear Aromatic Hydrocarbons (PNAs); pesticides, Polychlorinated Biphenyls (PCBs) and metals. In addition, fifty (50) bulk soil samples were collected from the crawlspace and were analyzed for asbestos content. Twenty (20) spore trap air samples and eleven (11) culturable air samples were also collected to evaluate concentrations mold and bacteria in ambient air on the interior of the structure. Aires determined indoor bacteria concentrations were at normal levels and indoor mold levels were abnormal, which is indicative of mold growth on building materials. Trace quantities of asbestos, all less than 0.5%, were detected in the bulk soil samples. Soil sample SB-3, collected from a depth of 14 – 16 feet below ground surface (bgs), detected benzene at a concentration that exceeds the State's residential and commercial/industrial Tier 1 soil clean-up objectives. Several additional VOCs were detected, but none exceeded Tier 1 cleanup objectives. Several soil samples detected PNAs at depth intervals ranging from the surface to 14 – 16 feet bgs. The highest PNA concentrations were detected

in surface soil sample SSB-1. Although Aires states in the report that no detected metals exceeded the IEPA's most stringent ingestion or inhalations standards, several soil samples also contained elevated concentrations of arsenic that exceed established area background concentrations, which also serves as the residential and commercial/industrial ingestion standards. Aires concludes that the most likely potential source of the identified PNA contamination is the former coal gasification plant located at 500 Walker Street.

Phase II Environmental Site Assessment – January 2009

The report was prepared on behalf of the Ottawa School District by Aires Consulting Group. The investigation consisted of the collection of twenty (20) soil samples (SS-1 – SS-20) from surface areas throughout the *property*. The samples were analyzed for PNAs. The report indicates that seven (7) of the twenty (20) soil samples exceeded the applicable State Tier 1 cleanup objectives for residential properties for the PNA compounds benzo(a)pyrene, chrysene, benzo(a)anthracene, and benzo(b)fluoranthene. All exceedances occurred in soil samples collected from the central and eastern regions of the *property*. No exceedances occurred in samples collected from the athletic track and field located at the western region of the *property*. Aires states that they were unable to determine if the detected contaminants were a result of the 2008 flooding or former uses of the *property*.

Environmental Site Assessment – PowerPoint Presentation

The presentation was prepared on behalf of the Ottawa School District by Aires Consulting Group and summarizes a series of environmental assessment activities completed on the *property*. The assessment objectives consisted of the following:

- 1) Identify if water intrusion from flooding caused environmental impact within the school building.
- 2) Identify if the flood event caused impact as a result of 500 Walker Street.

The investigation consisted of soil and groundwater sampling along with asbestos, mold, and bacteria sampling on the interior of the school building. The presentation states that asbestos containing floor tile on the building's first floor and thermal system insulation (pipe wrap) in the crawlspace were impacted as a result of the flooding. The presentation also discusses the former coal gasification plant at the western

region of the *property* and states that VOCs had impacted groundwater and PNAs were concentrated near structures on the *property* as a result. From the middle 1800s into the 1950s, before natural gas was available as an energy source, coal gasification plants, also known as manufactured gas plants (MGPs) used coal and oil to produce gas for distribution to surrounding areas for lighting, heating, and cooking. In addition to gas, MGPs produced a variety of byproducts such as coal tar. Byproducts of petroleum processing or the combustion of fossil fuels and organic material are common sources of PNAs. A supplied Bedrock Water Bearing Unit Contour Map depicts six deep monitoring wells located on the current track and field area of the *property* and identifies groundwater as moving due east towards the school building. The depicted wells appear to have been part of historical assessment and cleanup activities that occurred as a result of the former MGP.

The presentation also discusses a series of soil borings that were completed for soil sampling purposes on the *property*. According to the presentation, the VOC benzene was detected in a single sample above Tier I inhalation standards at a depth of 16 feet. No surface impacts of VOCs were reported. PNA's were reported to be found above Tier I levels on surface area to the north of the school building and in the crawlspace from the surface to a depth of four feet. The presentation indicates that the detected PNA's may be a result of a partial failure of an in-place engineered barrier, soil erosion, or present as a result of past land uses. Additional surface sampling was recommended to identify the extent of the PNA contamination. No analytical results containing the detected concentrations of contaminants were provided. However, it appears that all analytical results were provided in the previously discussed Phase II ESAs.

In addition to the prior discussed documents, Mr. Noble provided a recorded copy of a NFR Letter issued for the track and field area of the *property*, where MGP operations had once occurred. A more in-depth summary of the NFR Letter occurs in Section 7.4.

5.0 RECORDS REVIEW

5.1 Standard Environmental Record Sources

The ASTM E 1527-05 Standard specifies the standard environmental record sources that shall be reviewed and the minimum search distance. Table 3 summarizes the standard environmental records and minimum search distance.

**Table 3 – Standard Environmental Record Sources and
Approximate Minimum Search Distances**

Standard Environmental Record Sources (where available)	Approximate Minimum Search Distance (miles)
Federal NPL site list	1.0
Federal Delisted NPL site list	0.5
Federal CERCLIS list	0.5
Federal CERCLIS NFRAP site list	0.5
Federal RCRA CORRACTS facilities list	1.0
Federal RCRA non-CORRACTS TSD facilities list	0.5
Federal RCRA generators list	<i>Property and adjoining properties</i>
Federal ERNS list	<i>Property only</i>
Federal institutional control/engineering control registries	<i>Property only</i>
State and tribal lists of hazardous waste sites identified for investigation or remediation: State and tribal equivalent NPL	1.0
State and tribal lists of hazardous waste sites identified for investigation or remediation: State and tribal equivalent CERCLIS	0.5
State and tribal landfill and/or solid waste disposal site lists	0.5
State and tribal leaking underground storage tank (LUST) lists	0.5
State and tribal registered underground storage tank (UST) lists	<i>Property and adjoining properties</i>
State and tribal institutional control/engineering control registries	<i>Property only</i>
State and tribal voluntary cleanup sites	0.5
State and tribal Brownfield sites	0.5

FEHR GRAHAM

ENGINEERING & ENVIRONMENTAL

Letter of Transmittal

To: Ms. Romona Smith
USEPA / SM-7J
77 West Jackson Boulevard
Chicago, Illinois 60604

Date: April 3, 2013

Subject: Phase I Environmental Site Assessment (ESA)
Former Central Elementary School Property
400 Clinton Street
Ottawa, Illinois

We are sending you the following:

☒ Attached

Via: UPS Ground #1Z6E38090347801922

☐ Report / Permit / Study
☐ Plans / Specifications
☒ Other: See below

☐ Land Survey Drawings
☐ Shop Drawings

☐ Contract / Agreement
☐ Calculations

☐ Change Order
☐ Check

Quantity	Date / No.	Description
1	12/6/2012	CD containing electronic file (PDF) of Phase I ESA Report

These Items are Transmitted as Checked Below:

☐ For Distribution
☒ For Your Use
☐ As Requested
☐ For Review & Comment

☐ Reviewed
☐ Reviewed / Revised
☐ Returned for Corrections
☐ Construction

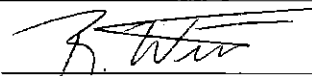
☐ Resubmit
☐ Submit
☐ Return
☐ Examination & Approval

☐ Copies / Review
☐ Copies / Distribute
☐ Corrected Prints
☐ Other:

Remarks:

Copy to:

Signed:



Robert M. Wilhelmi
Project Manager

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Smith, Romona

From: Smith, Romona
Sent: Tuesday, February 26, 2013 7:10 AM
To: 'Rob Wilhelmi'
Cc: Dave Noble; Joel Zirkle
Subject: RE: Hazardous Substance Eligibility Determination Request

Good Morning Rob:

This message serves as my official notice to you that the activities described in your eligibility request for the following site meets the requirements for the City of Ottawa to conduct Phase II activities for the site identified below under Cooperative Agreement [2B00E611-01 and BF00E01087-0] and are therefore eligible for use of grant funds. However, I am asking that you provide detailed budget information regarding what will be charged to which grant for tracking purposes.

Requested Site Details:

Former Central School Bldg.
400 Clinton Street
Ottawa, IL 61350

From: Rob Wilhelmi [<mailto:RWilhelmi@fehr-graham.com>]
Sent: Monday, February 18, 2013 11:55 AM
To: Smith, Romona
Cc: Dave Noble; Joel Zirkle
Subject: Hazardous Substance Eligibility Determination Request

RE: City of Ottawa, Illinois
BF-00E61101-0 and BF-00E01087-0

Hello Romona,

On behalf of the City of Ottawa, we are requesting an eligibility determination for the use of Hazardous Substance assessment grant funds for the former Central School parcels. A Phase I ESA was initially completed by the City using Petroleum Assessment Grant Funds on December 6, 2012. However, data obtained as a result of the Phase I indicates that Hazardous Substances are now the primary contaminant of concern, as detailed in the attached eligibility determination matrix. The city wishes to continue with Phase II investigation activities using their remaining Hazardous Substance Assessment Grant Funds from FY2008 and their newer FY2012 Assessment Grant Funds. As always, a Sampling & Analysis Plan and Site Specific Health & Safety Plan will be submitted for approval prior to any field work. Please let me know if you have any questions.

Sincerely,

ROBERT WILHELM | Project Manager
Fehr Graham
1920 Daimler Road
Rockford, Illinois 61112
P: 815.394.4700
C: 815-821-3592
F: 815.394.4702

www.fehr-graham.com

Whatever you do, do your work heartily, as for the Lord rather than for men, knowing that from the Lord you will receive the reward of the inheritance. - Colossians 3: 23-24